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MCE Corporation
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10 UNITED STATES BANKRUPTCY COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN FRANCISCO DIVISION

13 In re
14 PG&E CORPORATION,
15 Debtor-in-Possession.

Case No. 19-30088-DM
Chapter 11
Hon. Dennis Montali

16 In re
17 PACIFIC GAS AND ELECTRIC
18 COMPANY,
19 Debtor-in-Possession.

Case No. 19-30089-DM
Chapter 11
Hon. Dennis Montali

**DECLARATION OF JEFF CORE IN
SUPPORT OF MCE CORPORATION'S
RESPONSE TO CERTAIN FIRST DAY
MOTIONS**

20 Date: January 31, 2019
21 Time: 10:00 a.m.
22 Ctrm: 450 Golden Gate Ave., 16th Floor
San Francisco, CA 94102

23 I, Jeff Core, declare as follows:

24 1. Except as indicated otherwise, I have personal knowledge of the matters set forth
25 in this declaration and, if called upon to testify, I could and would competently testify thereto. I
26 am over 18 years of age. I am the President and CEO of MCE Corporation, and I make this
27 declaration in support of MCE Corporation's Response to Certain First Day Motions.
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2. As of January 29, 2019, the Debtors owe MCE Corporation approximately \$1,164,111.

3. The Master Service Agreement between MCE Corporation and the Debtors does not prohibit MCE Corporation from filing liens, and MCE Corporation retains its lien rights.

4. MCE Corporation provides services relating to all facets of pavement restoration. It primarily supports the Debtors' gas transmission capabilities (predominantly in the East Bay, South Bay, North Bay, and San Joaquin Valley divisions). MCE Corporation restores pavement that has been disturbed by work performed by or for the Debtors in the process of maintaining in-ground transmission assets. Upon completion of their maintenance work, the Debtors or their subcontractors typically provide a temporary patch that degrades quickly. Final restoration services performed by MCE Corporation are usually required within 30 days. MCE Corporation often performs work on busy thoroughfares, requiring adequate traffic control to maintain safe conditions for members of the public using the affected roadways. I am informed and believe that the work MCE Corporation performs for the Debtors is vital to the protection and functioning of the Debtors' gas transmission capabilities.

I declare under penalty of perjury that the above statements are true and correct. This declaration is executed on January 31, 2019, in CONCORD, California.

/s/
Jeff Core